

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

AP, by and through her Next Friend
ANGELA VEACH,

Plaintiff,

v.

Case No. 4:15-cv-331

BLUE SPRINGS SCHOOL DISTRICT,
DOUGLAS NIELSON,
SETH SHIPPY,

Defendants.

NOTICE OF REMOVAL

TO: The Judges of the United States District for the Western District of Missouri.

Defendants Blue Springs School District, Douglas Nielsen and Seth Shippy, in the above-entitled cause, respectfully remove this case to this Court from the Circuit Court of Jackson County, Missouri. In support of removal, Defendants Blue Springs School District, Douglas Nielsen and Seth Shippy state as follows:

1. This is a suit of a civil nature over which the District Courts of the United States have original jurisdiction pursuant to the provisions of 42 U.S.C. § 1983 and 20 U.S.C. § 1681 through § 1688 in that it involves an alleged Federal question, and therefore it is one which may be removed to this Court by Defendants pursuant to 28 U.S.C. § 1441 (c)(A).

2. The above-titled cause was commenced in the Circuit Court of Jackson County, Missouri on or before April 6, 2015. On or about April 6, 2015, Plaintiff filed her Petition in the Circuit Court of Jackson County, Missouri. The matter was assigned Case No. 1516-CV07231.

4. True and correct copies of all filings from Jackson County, Missouri Circuit Court Case No. 1516-CV07231 are attached hereto and marked as **Exhibit A**.

5. In accordance with 28 U.S.C. §1446(d), removing Defendants are promptly notifying Plaintiff, in writing, that this case has been removed to this Court pursuant to this Notice of Removal. Removing Defendants have, contemporaneously with the filing of this Notice of Removal to this Court, filed a copy of the same with the Clerk of the Circuit Court of Jackson County, Missouri in conformity with 28 U.S.C. § 1446(d).

6. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), as this Notice of Removal is filed within thirty (30) days of receipt of Plaintiff's Petition in this action by Defendants Blue Springs School District, Douglas Nielsen and Seth Shippy.

7. Defendants Blue Springs School District, Douglas Nielsen and Seth Shippy are the only Defendants who have received a copy of Plaintiff's Petition for Damages and each consents to removal of the action to this Court.

WHEREFORE, Defendants Blue Springs School District, Douglas Nielson and Seth Shippy remove this case to this Court for all future proceedings.

Respectfully submitted,

CORONADO KATZ LLC

/s/ Steven F. Coronado

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ATTORNEYS FOR DEFENDANTS BLUE
SPRINGS SCHOOL DISTRICT, DOUGLAS
NIELSEN AND SETH SHIPPY

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was filed via the ECF Filing system causing a service copy to be sent on May 4, 2015 to:

Nicole Fisher MO 59341 Larry Wright MO 55246 Wright & Fisher, LLC 1000 Broadway Blvd, 4 th Floor Kansas City, Missouri 64105 Phone: (816) 471-7008 Fax: (816) 471-1701 nicole@wrightandfisher.com Attorneys for Plaintiffs	
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/s/ Steven F. Coronado
Attorney for Defendants